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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

Case: 2:22-cr-20507
Judge: Berg, Terrence G.
MJ: Grey, Jonathan J.C.
Filed: 10-05-2022
INDI USA VS SEALED MATTER (DP)

v.

VIO: 21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 1956(h)
18 U.S.C. § 1957

D-1 ANDRE PHARR a/k/a "Chip,"
"Chippy,"
D-2 CLIFFORD JONES JR. a/k/a
"Gue," "Gue Wop,"
D3 JEFFREY HESTER-JACKSON
a/k/a "Jazzy,"
D-4 MARIO AYLER,
D-5 GABRIELLE THOMAS, and
D-6 CRYSTAL HUGHES

Defendants.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 846 & 841(a)(1) - Conspiracy to Possess with Intent to Distribute
and to Distribute a Controlled Substance)

D-1 ANDRE PHARR
D-2 CLIFFORD JONES JR.
D-3 JEFFREY HESTER-JACKSON
D-4 MARIO AYLER

1. Beginning in or around August 2020 and continuing to on or about June 16, 2022, in the Eastern District of Michigan, and elsewhere, the defendants, Andre Pharr a/k/a “Chip” “Chippy”, Clifford Jones Jr. a/k/a “Gue” “Gue Wop,” Jeffrey Hester-Jackson a/k/a “Jazzy,” and Mario Ayler, did knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons known and unknown to the grand jury to possess with the intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

2. The controlled substances attributable to Andre Pharr, Clifford Jones Jr., Jeffrey Hester-Jackson, and Mario Ayler, as a result of their own conduct, and the conduct of other members of the conspiracy that was reasonably foreseeable to them, are:

- a. 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly known as fentanyl; and
- b. 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, and 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers.

In violation of Title 21, United States Code, Section 841(b)(1)(A)(vi) and (viii).

COUNT TWO

(21 U.S.C. § 841(a)(1) –Possession with intent to distribute a controlled substance)
D-4 MARIO AYLER

On or about June 16, 2022, in the Eastern District of Michigan, the defendant, Mario Ayler, did knowingly and intentionally possess with intent to distribute a controlled substance, specifically, 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide, commonly known as fentanyl, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vi).

COUNT THREE

(21 U.S.C. § 841(a)(1) –Possession with intent to distribute a controlled substance)
D-4 MARIO AYLER

On or about June 16, 2022, in the Eastern District of Michigan, the defendant, Mario Ayler, did knowingly and intentionally possess with intent to distribute a controlled substance, specifically, 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

COUNT FOUR

(18 U.S.C. § 922(g)(1) - Felon in possession of a firearm and ammunition)

D-1 ANDRE PHARR

On or about June 16, 2022, in the Eastern District of Michigan, the defendant, Andre Pharr a/k/a “Chip” “Chippy,” after having previously been convicted of a crime punishable by imprisonment for a term exceeding one year (a felony offense), knowing that he had been so previously convicted, did knowingly and unlawfully possess a firearm and ammunition, that is, Glock .40 caliber handgun with 12 rounds of ammunition, in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

(18 U.S.C. § 922(g)(1) - Felon in possession of a firearm)

D-2 CLIFFORD JONES JR.

On or about June 16, 2022, in the Eastern District of Michigan, the defendant, Clifford Jones Jr. a/k/a “Gue,” “Gue Wop,” after having previously been convicted of a crime punishable by imprisonment for a term exceeding one year (a felony offense), knowing that he had been so previously convicted, did knowingly and unlawfully possess a firearm, that is, Glock .40 caliber handgun, in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX

(18 U.S.C. § 922(g)(1) - Felon in possession of a firearm)

D-3 JEFFREY HESTER-JACKSON

On or about June 16, 2022, in the Eastern District of Michigan, the defendant, Jeffrey Hester-Jackson a/k/a “Jazzy,” after having previously been convicted of a crime punishable by imprisonment for a term exceeding one year (a felony offense), knowing that he had been so previously convicted, did knowingly and unlawfully possess a firearm, that is, Glock .40 caliber handgun, in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN

(18 U.S.C. § 1956(h) – Conspiracy to Commit Money Laundering)

D-1 ANDRE PHARR
D-2 CLIFFORD JONES JR.
D-3 JEFFREY HESTER-JACKSON
D-5 GABRIELLE THOMAS
D-6 CRYSTAL HUGHES

From in or around August 2020 through in or around July 2022, in the Eastern District of Michigan, and elsewhere, the defendants, Andre Pharr a/k/a “Chip,” “Chippy,” Clifford Jones Jr. a/k/a “Gue,” “Gue Wop,” Jeffrey Hester-Jackson a/k/a “Jazzy,” Gabrielle Thomas, and Crystal Hughes, did knowingly

combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 and Section 1957, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to possess with the intent to distribute and to distribute controlled substances, from a place in the United States to or through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i), Title 18, United States Code, Sections 1956(a)(1)(A)(i), (a)(1)(B)(i), (a)(1)(B)(ii), and (h).

MANNER AND MEANS

1. It was a part of the unlawful drug trafficking and money laundering conspiracy that the purchase, sale and distribution of large quantities of controlled substances generated significant amounts of cash which needed to be counted,

stored, hidden and used in order to continue the conspiracy but evade the detection of law enforcement. Examples of cash seizures include the following:

- a. \$51,000 in United States currency was seized from the checked baggage belonging to Gabrielle Thomas aboard a Delta Airlines flight destined for Arizona in May 2022, which was conducted at the direction of Jeffrey Hester-Jackson.
- b. \$16,152 in United States currency was seized from 23301 Yarrow Avenue, Clinton Township, Michigan, Clifford Jones, Jr.'s residence Clifford Jones Jr., in June 2022.
- c. \$17,680 in United States currency was seized from 19050 Delaware Street, Roseville, Michigan, a residence associated with Andre Pharr, in June 2022.
- d. \$12,610 in United States currency was seized from 12644 Wilshire, Detroit, Michigan, a residence associated with Jeffrey Hester-Jackson, in June 2022.
- e. \$4,920 in United States currency was seized from 5327 Cadillac, Detroit, Michigan, a residence associated with Mario Ayler, in June 2022.

- f. \$958 in United States currency was seized from 1556 E Lafayette Street, #362, Detroit, Michigan, a residence associated with Jeffrey Hester-Jackson, in June 2022.

2. It was a part of the unlawful drug trafficking conspiracy and money laundering conspiracy that the purchase, sale and distribution of large quantities of controlled substances generated significant amounts of cash which needed to be counted, exchanged for large denomination bills, and given the appearance of having been earned legitimately in order to continue the conspiracy and conceal the true source, nature and ownership of the funds involved in these transactions. From approximately October 2020 through May 2022, Jeffrey Hester-Jackson and Andre Pharr purchased casino chips and placed sportsbook bets totaling over \$540,000 and later cashed-out casino chips and sportsbook bets totaling over \$445,000.

3. It was a part of the unlawful drug trafficking conspiracy and money laundering conspiracy that Jeffrey Hester-Jackson utilized nominees to purchase jewelry and lease a luxury apartment and vehicle while concealing the true source, nature and ownership of the funds involved in these transactions, the true source being the sale of controlled substances. For example:

- a. In October 2021, Jeffrey Hester-Jackson utilized Individual A as a nominee to enter into a luxury apartment lease. Individual A made

monthly lease payments on behalf of Jeffrey Hester-Jackson totaling over \$13,000.

- b. In December 2021, at Jeffrey Hester-Jackson's behest, Gabrielle Thomas purchased a men's Rolex watch for \$75,540. The watch was subsequently used by Jeffrey Hester-Jackson as collateral to obtain several pawn loans.
- c. In September 2021, Jeffrey Hester-Jackson utilized Individual B as a co-signor on a lease for a Dodge TRX truck used by Jeffrey Hester-Jackson. Individual B made the down payment on the lease and monthly lease payments on behalf of Jeffrey Hester-Jackson totaling over \$16,000. Jeffrey Hester-Jackson utilized the Dodge TRX truck to facilitate the distribution of controlled substances.

4. It was further part of the unlawful drug trafficking conspiracy and money laundering conspiracy that Andre Pharr, with the assistance of Individual C, opened business bank account XXXX7704 at Citizens Bank in the name of Triple A Global Kennel LLC in Roseville, Michigan. From approximately July 2021 through June 2022 approximately \$24,000 in cash was deposited into the bank account in the Metro Detroit, Michigan area. Some of the funds were used to place online gambling bets at Fanduel. The remaining funds were withdrawn from the account via POS transactions in California and ATM withdrawals in California.

Use of the business account concealed the true source, nature and ownership of the funds involved in these transactions, the true source being from the sale of controlled substances.

5. It was further part of the unlawful drug trafficking conspiracy and money laundering conspiracy that Crystal Hughes and others, acting on direction from Jeffrey Hester-Jackson and Andre Pharr transferred over \$20,000 via CashApp to individuals residing in Arizona, California, and elsewhere in order to continue the drug trafficking conspiracy and conceal the true source, nature and ownership of the funds involved in these transactions, the true source being from the sale of controlled substances.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS EIGHT-THIRTEEN

(18 U.S.C. § 1957 – Money Laundering)

D-1 ANDRE PHARR

D-3 JEFFREY HESTER-JACKSON

On or about the dates specified in the table below, in the Eastern District of Michigan, the defendant specified in the table below, did knowingly engage and attempt to engage in a monetary transaction by, through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is, the deposit, withdrawal, transfer, or exchange of United States Currency, such property having been derived from a specified unlawful activity, that is the conspiracy to possess with the intent to distribute and to distribute controlled substances:

COUNT	DEFENDANT	DATE	MONETARY TRANSACTION
8	Andre Pharr	October 14, 2020	\$30,000 cash payment to complete purchase of men's Rolex watch and diamond and gold chain
9	Andre Pharr	October 15, 2020	Redemption of \$13,000 in casino chips for cash at Greektown Casino
10	Jeffrey Hester-Jackson	January 6, 2022	\$11,000 cash wager at Barstool Sportsbook at Greektown Casino
11	Jeffrey Hester-Jackson	January 13, 2022	\$22,000 cash wager at Barstool Sportsbook at Greektown Casino

12	Jeffrey Hester-Jackson	May 23, 2022	\$50,000 in loan proceeds obtained from pawn of Rolex watch, S/N: L15Z8140
13	Jeffrey Hester-Jackson	May 31, 2022	\$15,279 cash payment to complete purchase of Audemars Piguet watch, S/N: F14628

In violation of Title 18, United States Code, Section 1957.

FORFEITURE ALLEGATIONS

1. The allegations set forth above in this Indictment are hereby incorporated by reference as if they were set forth in full herein for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461; and Title 18, United States Code, Sections 982(a)(1).

2. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of any of the controlled substance offenses in violation of Title 21, as alleged in this Indictment, the defendant shall forfeit to the United States: (a) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation(s); and (b) any property, real or personal, used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation(s).

3. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of any of the offense(s) in violation of Title 18, United States Code,

Sections 1956 or 1957, the defendant(s) shall forfeit to the United States any property, real or personal, involved in such offense(s), and any property traceable to such property.

4. **Substitute Assets:** If the property described above as being subject to forfeiture, as a result of any act of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. 853(p) as incorporated by 18 U.S.C. 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek to forfeit any property of the defendant up to the value of the forfeitable property described above.

5. Upon conviction of the firearm offenses charged in Counts Four, Five, and Six of this indictment, defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and 28 United States Code, Section 2461, any firearm or ammunition involved in said offense including but not limited

to: one Glock with .40 caliber 12 rounds of ammunition (Pharr), one .40 caliber Glock (Jones Jr.), and one Glock .40 caliber handgun (Hester-Jackson).

6. Forfeiture includes but is not limited to forfeiture of defendants' interests in the following assets:

- a. \$47,790.00 U.S. Currency;
- b. \$51,000.00 U.S. Currency;
- c. \$204,447.21 U.S. Currency;
- d. \$65,000.00 U.S. Currency;
- e. \$3,257.00 U.S. Currency;
- f. \$479.00 U.S. Currency;
- g. \$779.00 U.S. Currency;
- h. \$11,637.00 U.S. Currency;
- i. \$2,720.00 U.S. Currency;
- j. \$13,420.00 U.S. Currency;
- k. \$1,540.00 U.S. Currency;
- l. \$4,920.00 U.S. Currency;
- m. \$12,610.00 U.S. Currency;
- n. \$958.00 U.S. Currency;
- o. Century Arms Micro Draco 7.62x39mm Pistol, Magazine and Ammunition, including the following: Century Arms Micro Draco 7.62x39mm Pistol, SN: PMD-18514-20; 7.62x39mm Magazine; and 34 Rounds of 7.62x39mm Ammunition;
- p. Taurus PT-145 Millenium Pro .45 Caliber Pistol, Magazine and Ammunition, including the following: Taurus PT-145 Millenium Pro .45 Caliber Pistol, SN: NZH84349; .45 Caliber Magazine; and 9 Rounds of .45 Caliber Ammunition;
- q. Lorcin L-25 .25 Caliber Pistol, Magazine and Ammunition, including the following: Lorcin L-25 .25 Caliber Pistol, SN: 094905; .25 Caliber Magazine; and 5 Rounds of .25 Caliber Ammunition;
- r. Taurus G2C 9mm Pistol, Magazine and Ammunition, including the following: Taurus G2C 9mm Pistol, SN: TMS72307; 9mm Magazine; and 9 Rounds of 9mm Ammunition;

- s. Glock 22 .40 Caliber Pistol, Magazine and Ammunition, including the following: Glock 22 .40 Caliber Pistol, SN: FPK742; .40 Caliber Magazine; and 14 Rounds of .40 Caliber Ammunition;
- t. Glock 23 .40 Caliber Pistol, Magazine and Ammunition, including the following: Glock 23 .40 Caliber Pistol, SN: XPF316; .40 Caliber Magazine; and 16 Rounds of .40 Caliber Ammunition;
- u. Lorcin L-380 .380 Caliber Pistol, Magazine and Ammunition, including the following: Lorcin L-380 .380 Caliber Pistol, SN: 143572; .380 Caliber Magazine; and 6 Rounds of .380 Caliber Ammunition;
- v. Glock 30 .45 Caliber Pistol, Magazine and Ammunition, including the following: Glock 30 .45 Caliber Pistol, SN: MTK718; Extended .45 Caliber Magazine; and 15 Rounds of .45 Caliber Ammunition;
- w. Smith and Wesson BG38 .38 Special+ Caliber Revolver, Ammunition & Holster, including the following: Smith & Wesson BG38 .38 Special+ Caliber Revolver, SN: CUN3431; 5 Rounds of .38 Caliber Ammunition; and Holster;
- x. Marlin Glenfield Model 60 .22 Caliber Rifle, SN: 24586858;
- y. Poly Technologies AKS-762 7.62x39mm Rifle, SN: 85F-762-0310;
- z. Zastava Arms ZPAPM70 7.62x39mm Rifle, SN: Z70-095858;
- aa. Zastava Arms ZPAP92 7.62x39mm Rifle, Magazine and Ammunition, including the following: Zastava Arms ZPAP92 7.62x39mm Rifle, SN: Z92-076373; 7.62x39mm Magazine; and 30 Rounds of 7.62x39mm Ammunition;
- bb. Zastava Arms PAPM85NP 5.56mm Pistol, SN: M85-NP008822;
- cc. American Tactical Milsport 5.56 AR-15 5.56mm Carbine Rifle, Magazine and Ammunition, including the following: American Tactical Milsport 5.56 AR-15 5.56mm Carbine Rifle, SN: MSA079422; 5.56mm Double Drum Magazine; and 98 Rounds of 5.56mm Ammunition;
- dd. American Tactical Milsport 5.56 AR-15 5.56mm Carbine Rifle, Magazine and Ammunition, including the following: American Tactical Milsport 5.56 AR-15 5.56mm Carbine Rifle, SN: MSA085287; 5.56mm Double Drum Magazine; and 50 Rounds of 5.56mm Ammunition;

- ee. Glock 27 .40 Caliber Pistol, Magazine and Ammunition, including the following: Glock 27 .40 Caliber Pistol, SN: BSRP796; .40 Caliber Magazine; and 21 Rounds of .40 Caliber Ammunition;
- ff. Century Arms Draco 7.62x39mm Pistol, Magazines and Ammunition, including the following: 7.62mmx39mm Magazine; 7.62mmx39mm Magazine; and 64 Rounds of 7.62x39mm Ammunition;
- gg. Glock 26 9mm Pistol, Magazine and Ammunition, including the following: Glock 26 9mm Pistol, SN: AFYT653; 9mm Magazine; and 24 Rounds of 9mm Ammunition;
- hh. EAA Hermann Weihrauch Windicator .357 Caliber Revolver, Holster and Ammunition, including the following: EAA Hermann Weihrauch Windicator .357 Caliber Revolver, SN: 1080042; Holster; and 6 Rounds of .357 Caliber Ammunition;
- ii. EAA Hermann Weihrauch Windicator .357 Caliber Revolver with Holster, including the following: EAA Hermann Weihrauch Windicator .357 Caliber Revolver, SN: 1079985; and Holster;
- jj. EAA Hermann Weihrauch Windicator .357 Caliber Revolver, Holster and Ammunition, including the following: EAA Hermann Weihrauch Windicator .357 Caliber Revolver, SN: 1080042; Holster; and 6 Rounds of .357 Caliber Ammunition;
- kk. Glock 30 .45 Caliber Pistol, Magazine and Ammunition, including the following: Glock 30 .45 Caliber Pistol, SN: BNBE584; .45 Caliber Magazine; and 24 Rounds of .45 Caliber Ammunition;
- ll. Taurus PT-145 Millenium Pro .45 Caliber Pistol, Case, Magazine and Ammunition, including the following: Taurus PT-145 Millenium Pro .45 Caliber Pistol, SN: NA061791; Case for Taurus PT-145 Millenium Pro .45 Caliber Pistol; .45 Caliber Magazine; and 10 Rounds of .45 Caliber Ammunition;
- mm. Glock 23 .40 Caliber Pistol, Magazine and Ammunition, including the following: Glock 23 .40 Caliber Pistol, SN: HRX637; .40 Caliber Magazine; and 12 Rounds of .40 Caliber Ammunition;
- nn. Assorted Jewelry, including the following: Counterfeit Stainless steel replica Rolex Yacht-Master II watch; white dial; and Sterling silver stamped ring; size 6; set with cubic zirconia and imitation orange stone; 9.8;

oo. Assorted Jewelry, including the following: Stainless steel & 18k rose gold Rolex Yacht-Master II chronograph, SN: U3D03037; 10k yellow white and rose gold tested necklace; 24 inches long, 1690 round brilliant cut diamonds; 14k white gold stamped earrings; (2) round brilliant cut diamonds 3.70 carats; and 14k rose gold tested ring; size 10; (45) round brilliant cut diamonds an estimated 3.50 carats;

pp. Assorted Jewelry, including the following: 10k rose and white gold tested "42" pendant; approx. (1580) round brilliant cut diamonds; 10k white gold stamped necklace; 17 inches long, 1688 round brilliant cut diamonds; 14k rose gold tested necklace; 24 inches long, 21.4mm wide; 1880 round brilliant cut diamonds; 14k white gold tested necklace; 22 inches long. 18.6mm wide; 3470 round brilliant cut diamonds; 10k rose and white gold tested "4PF" pendant; approx. (1265) round brilliant cut diamonds; 14k rose gold tested "42" pendant; approx. (260) round brilliant cut diamonds; 14k rose gold tested "42" pendant; approx. (260) round brilliant cut diamonds; 10k rose gold stamped wheat chain; 15 inches long, 1.4mm wide; 3.5 grams; 10k rose gold stamped chain; 18 inches long, 2.97mm wide; 9.8 grams; 10k rose gold stamped wheat chain; 13 inches long; 1.3mm wide; 2.9 grams; 10k rose, white and yellow gold "Wario" pendant; approx. (2150) round brilliant cut diamonds; 10k rose gold tested "Scooby-Doo" pendant; approx. (1897) round brilliant cut diamonds; 14k rose gold tested necklace; 20 inches long, 18mm wide; (2775) round brilliant cut diamonds; 10k yellow gold stamped "Scooby-Doo" pendant; (390) round brilliant cut diamonds; 14k white gold tested "Heavy Camp" pendant; approx. (2150) round brilliant cut diamonds; 14k yellow gold tested necklace; 22 inches long. 18.6mm wide; (3470) round brilliant cut diamonds; 10k white gold tested "C" pendant; (850) round brilliant cut diamonds; 14k white gold tested "Big 4" pendant; (558) round brilliant cut diamonds 169 baguette cut diamonds; 10k yellow, white and rose gold stamped necklace; 22 inches long, (2225) round brilliant cut diamonds; 10k rose and white gold tested "4PF" pendant; approx. (950) round brilliant cut diamonds; 14k white gold stamped necklace; 22 inches long; (89) round brilliant cut diamonds; 14k white gold stamped necklace; 22

inches long; (89) round brilliant cut diamonds; 14k rose and white gold stamped necklace (114) round brilliant cut diamonds; 14k rose gold stamped bracelet; 7 inches long; (38) round brilliant cut diamonds; 10k white gold tested bracelet; 8 inches long; (252) round brilliant cut diamonds; 14k white and rose gold tested bracelet; 6.50 inches long; (418) round brilliant cut diamonds; 10k rose and white gold stamped bracelet; 7 inches long; (380) round brilliant cut diamonds; 10k rose and white gold stamped bracelet; 7 inches long; (936) round brilliant cut diamond; 10k rose and white gold tested bracelet; 7.5 inches long; (752) round brilliant cut diamonds; 10k rose and white gold stamped bracelet; 7 inches long; (367) round brilliant cut diamonds; 14k white gold stamped bracelet; 7.50 inches long; (740) round brilliant cut diamonds; Titanium Richard Mille RM011 Felipe Massa watch case; 42mm x 49mm; 18k rose gold Richard Mille Felipe Massa chronograph with aftermarket diamonds; 50mm case; Stainless steel & 18k rose gold Audemars Piguet Royal Oak chronograph Ser No J20356; Stainless steel Audemars Piguet Royal Oak openwork watch with aftermarket diamonds, SN: J33682; 18k white gold Rolex Day-Date II with aftermarket diamonds; pave dial Ser No V372516; 18k yellow gold Rolex Day-Date with aftermarket diamonds; Ser No X91325A5; 18k rose gold Rolex Day-Date II with aftermarket diamonds Ser No V816594; 18k rose gold Patek Philippe Nautilus with aftermarket diamonds; Ser No A384GAP; and Stainless steel & 18k rose gold Patek Philippe Nautilus with aftermarket diamonds Ser No A384GAP;

qq. Assorted Jewelry, including the following: Stainless steel & 18k rose gold Rolex DateJust with aftermarket parts and diamonds Ser No M164318, SN: M164318; 10k yellow gold stamped rose motif ring; size 6; (1) single cut diamond, an estimated 0.15 carats; and 14k rose and white gold stamped bracelet; (395) baguette cut diamonds, an estimated 3.50 carats; and

rr. Three (3) Earrings with Two (2) Backings.

7. **Money Judgment:** Upon conviction of one or more violations of

Title 21 alleged in this Indictment, the United States will seek a forfeiture money judgment against the defendants in an amount representing the total amount of proceeds obtained as a result of the aforementioned offenses, and/or the total amount involved in the violations of Title 21, United States Code, Sections 841 and 846. Upon conviction of violating 18, United States Code, Section 1956 or 1957, defendants shall be ordered to pay the United States a sum of money equal to the total amount involved in such offense(s).

THIS IS A TRUE BILL

/s/ Grand jury foreperson
GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

/s/ Benjamin Coats
BENJAMIN COATS
Chief, Drug Task Force
Assistant United States Attorney

/s/ Jihan Williams
JIHAN WILLIAMS
Assistant United States Attorney

/s/ Rajesh Prasad
RAJESH PRASAD
Assistant United States Attorney

Dated: October 5, 2022

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: JW

Case Title: USA v. Andre Pharr et al

County where offense occurred : Wayne and elsewhere

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/___ Information --- no prior complaint.
☐ Indictment/___ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 5, 2022
Date


 Jihan Williams
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: 313-226-9520
 E-Mail address: Jihan.Williams@usdoj.gov
 Attorney Bar #: P77686

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.